

IN THE UNITED STATES DISTRICT COURT  
FOR THE Western DISTRICT OF TENNESSEE  
Western DIVISION

RECEIVED  
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U.S. DISTRICT COURT  
WESTERN DIVISION  
MEMPHIS, TN

Cassey Lee Anderson Name )

Prison Id. No. 343750 )

~~\_\_\_\_\_ Name )~~

~~Prison Id. No. \_\_\_\_\_ )~~

~~Plaintiff(s) )~~

v. )

(Commissioner) )

Tony Parker Name )

(Warden) )

Johnny Fitz Name )

Defendants )

(List the names of all the plaintiffs filing this lawsuit. Do not use "et al." Attach additional sheets if necessary)

Civil Action No. \_\_\_\_\_  
(To be assigned by the Clerk's) office. Do not write in this space.)

Jury Trial Y Yes Y No

(List the names of all defendants against whom you are filing this lawsuit. Do not use "et al." Attach additional sheets if necessary.)

COMPLAINT FOR VIOLATION OF CIVIL RIGHTS  
FILED PURSUANT TO 42 U.S.C. § 1983

1. Previous lawsuits (The following information must be provided by each plaintiff.)

A. Have you or any other plaintiffs in this lawsuit filed any other lawsuits in the United States District Court for the Middle District of Tennessee, or in any other federal or state court?

Y Yes

Y No

B. If you checked the box marked "Yes" above, provide the following information:

1. Parties to this previous lawsuit:

Plaintiffs: Cassey Lee Anderson

Defendants: Donna Chisholm

2. In what court did you file the previous lawsuit? United States  
Western District of Tennessee Western Division  
(If federal court, name of the District; if you filed the lawsuit in state court, provide the name of the state and the County):
3. What was the case number of the previous lawsuit? 18-cr-2732
4. What was the Judge's name to whom case was assigned? Sheryl H. Lipman, John Peter, Thomas D. Todd
5. When did you file the previous lawsuit? October 2018 (Provide the year, if you do not know the exact date.)
6. What was the result of the previous lawsuit? For example, was the case dismissed, appealed, or still pending? Dismissed
7. When was the previous lawsuit decided by the court? 8/12/2019  
(Provide the year, if you do not know the exact date.)
8. Did the circumstances of the prior lawsuit involve the same facts or circumstances that you are alleging in this lawsuit?

Y Yes ☒ Y No

(If you have filed more than one prior lawsuit, list the additional lawsuit(s) on a separate piece of paper, and provide the same information for the additional lawsuits.)

II. THE PLAINTIFF'S CURRENT PLACE OF CONFINEMENT (The following information must be provided by each plaintiff.)

- A. What is the name and address of the prison or jail in which you are currently incarcerated? West Tennessee State Penitentiary  
P.O. Box 1150 Henning, TN 38041
- B. Are the facts of your lawsuit related to your present confinement?
- ☒ Y Yes ☐ Y No
- C. If you checked the box marked "No" in question II.B above, provide the name and address of the prison or jail to which the facts of this lawsuit pertain. N/A

D. Do the facts of your lawsuit relate to your confinement in a Tennessee Prison? ☒ Y Yes ☐ Y No

If you checked the box marked "No," proceed to question II.H.

E. If you checked the box marked "Yes" in question II.D above, have you presented these facts to the prison authorities through the state grievance procedure?

☒ Y Yes ☐ Y No

F. If you checked the box marked "Yes" in question II.E. above:

1. What steps did you take? Filed grievance, wrote numerous information request.

2. What was the response of prison authorities? Classification matters non-grievable.

G. If you checked the box marked "No" in question II.E above, explain why not.

H. Do the facts of your lawsuit pertain to your confinement in a detention facility operated by city or county law enforcement agencies (for example, city or county jail, workhouse, etc.)?

Y Yes ☒ Y No

I. If you checked the box marked "Yes" in question II.H above, have you presented these facts to the authorities who operate the detention facility?

Y Yes ☐ Y No

J. If you checked the box marked "Yes" in question II.I above:

1. What steps did you take? N/A

2. What was the response of the authorities who run the detention facility?

**Attach copies of all grievance related materials including, at a minimum, a copy of the grievance you filed on each issue raised in this complaint, the prison's or jail's response to that grievance, and the result of any appeal you took from an initial denial of your grievance.**

## III. PARTIES TO THIS LAWSUIT

## A. Plaintiff(s) bringing this lawsuit:

1. Name of the first plaintiff: Casey Lee Anderson  
 Prison Id. No. of the first plaintiff: 343750  
 Address of the first plaintiff: West Tennessee State Penitentiary  
P.O. Box 1150 Henning, TN 38041  
 (Include the name of the institution and mailing address, including zip code. If you change your address you must notify the Court immediately.)

2. Name of second plaintiff: N/A  
 Prison Id. No. of the second plaintiff: \_\_\_\_\_  
 Address of the second plaintiff: \_\_\_\_\_  
 (Include the name of the institution and mailing address, including zip code. If you change your address you must notify the Court immediately.)

If there are more than two plaintiffs, list their names, prison identification numbers, and addresses on a separate sheet of paper.

## B. Defendant(s) against whom this lawsuit is being brought:

1. Name of the first defendant: Tony Parker  
Commissioner of Tennessee Corrections  
 The first defendant's address: Rachel Jackson Building  
320 Sixth Avenue North, Nashville, TN 37243-0465  
 Named in official capacity? Y Yes Y No  
 Named in individual capacity? Y Yes Y No
2. Name of the <sup>2nd</sup> first defendant: Warden Johnny Fitz  
West Tennessee State Penitentiary  
 The <sup>2nd</sup> first defendant's address: West Tennessee State Penitentiary  
480 Green Chapel Rd. P.O. Box 1150 Henning TN 38041  
 Named in official capacity? Y Yes Y No  
 Named in individual capacity? Y Yes Y No

If there are more than two defendants against whom you are bringing this lawsuit, you must list on a separate sheet of paper the name of each additional defendant, their place of employment, their address, and the capacity in which you are suing them. If you do not provide the names of such additional defendants, they will not be included in your lawsuit. If you do not provide their proper name, place of employment, and address, the Clerk will be unable to serve them should process issue.

#### IV. STATEMENT OF FACTS

State the relevant facts of your case as briefly as possible. Include the dates when the incidents or events occurred, where they occurred, and how each defendant was involved. Be sure to include the names of other persons involved and the dates and places of their involvement.

If you set forth more than one claim, number each claim separately and set forth each claim in a separate paragraph. Attach additional sheets, if necessary. Use 8½ in. x 11 in. paper. Write on one side only, and leave a 1 in. margin on all four sides.

Security file shows, and reflects numerous gang hits. Hoguer Crips - Neighborhood Crips (Memphis Mafia and Gangster Disciple B's. #1) Plaintiff has wrote numerous request to Warden Fitz and Commissioner Parker requesting interstate Corrections Compact transfer, due to these "known", "recorded", and "Confirmed" gang hits in plaintiff's security file. No response or regard given to these request. Incidence in level III Stages. #2) Plaintiff cannot be safely housed outside of administrative segregation, and in some Tennessee prisons, on administrative segregation. without eventual attempts to plot and attempt to murder Plaintiff. Plaintiff is not safe anywhere inside Tennessee department of Corrections. #3) Plaintiff will show gang hits were put on plaintiff for helping security recorder cut key, microdics, and prevent staff and inmate assaults. SEE Continued Statement of Facts

V. RELIEF REQUESTED: Specify what relief you are requesting against each defendant.

- A. Tony Parker - arrange Interstate Corrections Compact
- B. Johnny Fitz - apply for Interstate Corrections Compact -

In The United States District Court  
For The Western District Of Tennessee Western  
Division.

(Plaintiff)  
Casey Lee Anderson  
v.

(Commissioner)  
Tony Parker  
(Warden)  
Johnny Fitz  
(Defendants)

Continuation of Statement of Facts

Filed Pursuant To 42 U.S.C. 1983

#4). Plaintiff has been threatened and harassed,  
(by gangs) due to these gang hits, for working with security to  
prevent assaults, and drug overdoses, or possible escape  
attempts.

#5). Plaintiff is in constant fear for his life within  
Tennessee prisons, even on administrative segregation  
within Tennessee prisons.

#6) Plaintiff cannot successfully, without constant fear  
or threat from gangs, work to become a better person,  
with positive, productive personal gains, outside of  
administrative segregation in Tennessee prisons, to assure  
the necessary skills are obtained and behavior modification



## Continuation page (2) Summary of Facts

(6<sup>B</sup>) adjustments are made, to assure plaintiff becomes fit to return to society, and with the skills, and mental developments skills, to not only be productive upon release, but to never return.

7). Plaintiff is now on administrative segregation, in connection with the gangs, paying a inmate David Eady, during Covid 19 quarantine, to sabotage Plaintiff's program, and second successful completion of Residential Therapeutic Community drug and behavior treatment program, at Northwest Correctional Complex, so that Plaintiff would be removed from program, and placed back in unit 9 55 cell, on the main compound, where Plaintiff almost lost his life the year before by the gangs, and placed in protective custody, but was allowed to return back to the program previously completed, due to the program being separated from the main compound.

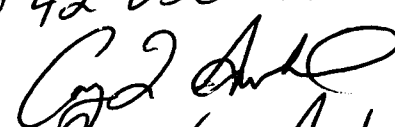
8). Being transferred to a prison, outside the state of Tennessee, in way of Interstate Corrections Compact, etc.

Continuation page(3)

## Summary of Facts

88.) If transferred correctly, and outside the awareness and knowledge of the gangs, would assure I could feel, and be safe enough, to return to general population, where programs are available to plaintiff, to safely allow Plaintiff, a successful rehabilitation upon incarceration and scheduled release.

9.) If not transferred by way of interstate Corrections Compact, for the plaintiff, its only common knowledge, inmate and plaintiff Casey Lee Anderson, will be eventually murdered, or if lucky just assaulted.

I, Casey Lee Anderson #343750, on this 26 day of May 2021, hereby certify under penalty of perjury that the foregoing Complaint For Violation Civil Rights Complaint Filed Pursuant to 42 USC 1983 Statement of Facts are true and correct.  343750 05/26/2021  
Casey Lee Anderson - 343750



(ICC) Interstate Corrections Compact

- C. Plaintiff Casey Lee Anderson be transferred via ICC  
D. Plaintiff Casey Lee Anderson continued in ICC until  
E. Sentence is executed with Tennessee Corrections.  
F. I request a jury trial. ☒ Yes ☐ No

VI. CERTIFICATION

I (we) certify under the penalty of perjury that the foregoing complaint is true to the best of my (our) knowledge and belief.

Signature:  Date: 05-23-2021

Prison Id. No. 343750

Address: West Tennessee State Penitentiary  
P.O. Box 1150 Henning, TN 38041  
(Include the city, state, and zip code.)

~~Signature: \_\_\_\_\_ Date: \_\_\_\_\_~~

~~Prison Id. No. \_\_\_\_\_~~

~~Address: \_\_\_\_\_~~

~~(Include the city, state, and zip code.)~~

**ALL PLAINTIFFS MUST SIGN AND DATE THE COMPLAINT, and provide the information listed above. If there are more than two plaintiffs, attach a separate sheet of paper with their signatures, dates, prison identification numbers, and addresses.**

**ALL PLAINTIFFS MUST COMPLETE, SIGN, AND DATE SEPARATE APPLICATIONS TO PROCEED IN FORMA PAUPERIS, if not paying the civil filing fee.**

**SUBMIT THE COMPLAINT, THE REQUIRED FILING FEE, OR APPLICATION TO PROCEED IN FORMA PAUPERIS TOGETHER. Complaints received without the required filing fee or application to proceed in forma pauperis will be returned. Filing fees, or applications to proceed in forma pauperis, received without a complaint will be returned.**